

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,
vs.

Case No.: 2:23-cr-20191-MSN

**EMMITT MARTIN, III,
TADARRIUS BEAN, DEMETRIUS
HALEY, DESMOND MILLS, JR.,
AND JUSTIN SMITH**

Defendant.

MOTION FOR EXTRAORDINARY RELIEF

Come Now Defendant, Tadarrius Bean, by and through counsel, filing this *Motion to for Extraordinary Relief* and in support thereof would show this Court the following, to wit:

1. That on the 12th day of September 2023 Defendant Tadarrius Bean was indicted in the above referenced matter.
2. On September 13, 2023, Defendant Bean appeared before the Court and an Order Setting Conditions of Release (ECF No.: 18) was entered. Said Order required Defendant Bean to submit to GPS monitoring that required him to meet all conditions per the referenced Order.
3. That due to Defendant Bean complying with the Court's and Probation Service conditions and not posing any risk of flight or danger, Counsel for the Defendant is requesting that the previously given conditions are altered.
4. That if Defendant demonstrates full compliance with the modified conditions, including remaining within the designated district and adhering to his curfew, Defendant respectfully request that the Court eventually modifies the conditions of release by

removing GPS monitoring requirement while ensuring all other conditions remain in place.

5. That Bean's Probation Officer does not oppose the same.
6. Recently, the position of Defendant Justin Smith conditions was amended to reflect the same relief.

For the foregoing reasons, Defendant Bean hereby asks that this Court modify the conditions by removing the GPS monitor requirements.

Respectfully submitted,

PERRY GRIFFIN, PC

/s/ John Keith Perry, Jr.

John Keith Perry, Jr., #24283

Attorney for Defendant

5699 Getwell Road. Bldg. G5

Southaven, MS 38672

P: 662-536-6868

F:662-536-6869

JKP@PerryGriffin.com

CERTIFICATE OF SERVICE

I, John Keith Perry, certify that I have filed a true and correct copy of the above and foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

David Pritchard

U.S. ATTORNEY'S OFFICE

Federal Building

167 N. Main Ste. 800

Memphis, TN 38103

Email: david.pritchard2@usdoj.gov

Forrest Christian

DOJ-CRT

950 Pennsylvania Avenue, NW Building

Room 7116

Washington, DC 20530

Email: Forrest.Christian@usdoj.gov

Kathryn Gilbert

DOJ-CRT

950 Pennsylvania Ave NW

Washington, DC 20530

Email: kathryn.gilbert@usdoj.gov

Elizabeth Jane Rogers

US ATTORNEY'S OFFICE

167 N. Main Suite 800

Memphis, TN 38103

elizabeth.rogers@usdoj.gov

Andrew Manns

DOJ-CRT

150 M Street NE

Washington, DC 20002

andrew.manns@usdoj.gov

William D. Massey

MASSEY & MCCLUSKY

3074 East Street

Memphis, TN 38128

Email: masseymccluskylaw@gmail.com

Stephen R. Leffler

LAW OFFICE OF STEPHEN R. LEFFLER, P.C.

2670 Union Avenue Ext Suite 819

Memphis, TN 38112

stephenrleffler@yahoo.com

Michael Stengel

MICHAEL J. STENGEL, ATTORNEY AT LAW

619 South Cooper Street Memphis, TN 38104

Email: stengel12260@mjspc.com

Martin W. Zummach

SPARKMAN ZUMMACH, P.C.

P.O. Box 266 Southaven, MS 38671-0266

Email: martin@sparkman-zummach.com

This the 21st day of February 2025.

/s/ John Keith Perry, Jr.
JOHN KEITH PERRY, JR.

